

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SONYA LARSON,

Plaintiff

v.

C. A. No.: 1:19-CV-10203-IT

DAWN DORLAND PERRY,
COHEN BUSINESS LAW GROUP, PC and
JEFFREY A. COHEN, ESQUIRE,

Defendants.

AND

DAWN DORLAND PERRY

Plaintiff-in-Counterclaim

v.

SONYA LARSON

Defendant-in-Counterclaim

**DAWN DORLAND PERRY’S PARTIALLY ASSENTED-TO MOTION FOR LEAVE TO
FILE A REPLY BRIEF IN FURTHER SUPPORT OF HER MOTION TO COMPEL**

Dawn Dorland Perry (“Ms. Dorland”) submits this motion seeking leave to file a reply brief in support of her motion to compel (ECF No. 106) in the above-captioned litigation. In support of her motion, Ms. Dorland states as follows:

1. Ms. Dorland filed her motion to compel, seeking a complete production of documents and sanctions, on March 15, 2021.
2. On March 29, 2021, Ms. Larson filed an opposition to said motion.

3. On March 30, 2021, Ms. Dorland received a further production from Ms. Larson, via U.S. Mail, containing 420 additional documents on a thumb drive.
4. Many, if not most, of the documents are highly relevant to this litigation, and merit an update for the Court concerning the status of Ms. Larson's production.
5. The Reply Brief will be no more than ten (10) pages in length, and will address matters not raised previously, which could not have been anticipated at the time that the original motion was filed.
6. Jeffrey Cohen and the Cohen Business Law Group assent to this motion. Ms. Larson refused to assent.
7. The proposed brief in reply is attached hereto as Exhibit A.

Respectfully Submitted,

DAWN DORLAND PERRY,

By her attorneys,

/s/ Suzanne Elovecky

Suzanne Elovecky (BBO # 670047)
PARTRIDGE, SNOW & HAHN LLP
30 Federal Street, 7th Floor
Boston, MA 02110
(617) 292-7900
[selovecky@psh.com](mailto:slovecky@psh.com)

Dated: April 5, 2021

CERTIFICATE PURSUANT TO LOCAL RULES 7.1 and 37.1

I, Suzanne M. Elovecky, do hereby certify that, pursuant to Local Rule 7.1(a)(2) and Local Rule 37.1, I have conferred with counsel for the Plaintiff in an attempt to resolve or narrow the issues raised by the foregoing motion and have been unsuccessful. Said conference took place by telephone at noon on April 5, 2021, after providing a draft of this motion for counsel's review. During the conference, counsel for Jeffrey Cohen and the Cohen Business Law Group assented to this motion, and counsel for Sonya Larson refused to assent.

Respectfully submitted,

DAWN DORLAND PERRY,

By her attorneys,

/s/ Suzanne Elovecky

Suzanne Elovecky, Esq. (BBO # 670047)
PARTRIDGE, SNOW & HAHN LLP
30 Federal Street, 7th Floor
Boston, MA 02110
(617) 292-7900
selovecky@psh.com

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 5, 2021.

/s/ Suzanne M. Elovecky

Suzanne M. Elovecky (BBO #670047)